

**MEMO ENDORSED**

***LEEDS BROWN LAW, P.C.***

One Old Country Road, Ste. 347  
Carle Place, NY 11514  
(516) 873-9550

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*Attorneys at Law*

November 13, 2020

**Via ECF**

Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

Re: Kerr v. Physician Affiliate Group of New York P.C., et al.  
17 Civ. 1777 (VEC)

Dear Judge Caproni:

This office represents the Plaintiff in the above referenced matter. I write with consent of all counsel, seeking an extension of the deadline for Plaintiff to oppose Defendants' joint motion in limine. This is our first request for an extension of this deadline. Pursuant to the Court's scheduling order (Dkt 166), the parties exchanged motions in limine on November 4, 2020. The opposition papers are due on November 18, and the Court did not permit replies.

Defendants' memorandum of law contains eight points, some with subpoints, seeking to exclude at least ten categories of evidence. The motion is complex, involves significant legal research, and review of a lengthy record. We have only two weeks to respond, during which we have other personal and professional obligations. We therefore respectfully request a two-week adjournment to December 2. Plaintiff also requests that defendants' deadline be similarly extended. We do not think this delay would slow our ability to be ready for trial.

We thank the Court for its consideration of this request.

Application GRANTED. Responses to motions *in limine* are due by **December 2, 2020**. The joint pretrial order, requests to charge, and proposed *voir dire* questions remain due **December 16, 2020**. As previously indicated, the parties will receive at least one month notice of the trial date.

SO ORDERED.

Very truly yours,

LEEDS BROWN LAW, P.C.

/s/

RICK OSTROVE



11/13/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

cc: All counsel (Via ECF)